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5 UNITED STATES COURT FOR THE
6 EASTERN DISTRICT OF NEW YORK

7 LUCIO CELLI,
8 Appellant/Petitioner/Defendant,
9 vs.
10 United States of America,
11 Appellee/Respondent/Plaintiff

Case No.: 19-cr-00127
MOTION TO FIND OUT HOW MUCH RANDI
WIENGARTEN BRIDED JUDGE ENGELMAYER, AS IT
APPEARS JUDGE ENGELMAYER BEHAVED IN THE
SAME MANNER THAT RANDI WANTED/PAID JUDGE
MARRERO

12
13 Dear Judge Engelmayer,

14 Your Honor messed up when you lied about your association
15 with Sen. Schumer because this was the main topic of Judge
16 Porteous' impeachment trial. The main outcome of the trial is
17 the fact that once a judge lies about association with someone,
18 they are deemed to be biased in that case and if they stayed on,
19 they stayed on to help the person that they lied about, which in
20 this case would be Sen. Schumer. However, Sen. Schumer does not
21 know me, but Randi Weingarten does, and Sen. Schumer has deemed
22 her (Randi) to be like his sister

23 I. Fraud Upon the Court

24 Your Honor was not a neutral arbiter as required by the Due
25 Process Clause of the 5th and 14th Amendment. According to the 2d.
26 Cir., "fraud on the court will, most often, be found where the
27 fraudulent scheme defrauds the "judicial machinery" or is
perpetrated by an officer of the court such that they cannot
perform its function as a neutral arbiter of justice. See
Martina Theatres Corp. v. Schine Chain Theatres, Inc., 278 F.2d
789, 801 (2d. Cir. 1980)

28 MOTION TO FIND OUT HOW MUCH RANDI WIENGARTEN BRIDED JUDGE ENGELMAYER, AS IT
APPEARS JUDGE ENGELMAYER BEHAVED IN THE SAME MANNER THAT RANDI WANTED JUDGE
MARRERO TOO - 1

1
2 Your Honor used your office to help Randi Weingarten and
3 Cogan to harm me via Sen. Schumer, like intimidating me when
4 Your Honor said, "you will not receive justice" or ignoring
5 misconduct of the AUSA and my lawyer, which I have letters from
6 the DOJ and statements. Your Honor helped to edit Randi
7 Weingarten out of the transcript. Your Honor will not allow me
8 to develop a record of anyone's misconduct, which would include
9 your own.

10 Your Honor knew my intent prior to Mr. Silverman submitting
11 a brief because you received my emails, as Sen. Schumer did .
12 Your Honor knew that Randi/UFT wanted to expose my rape and
13 Betsy placed my HIV on her blog for Judge Cogan and Randi
14 Weingarten with the underlying issues that Randi paid Judge
15 Marrero

16 What Your Honor, the AUSA Karamigious and Mr. Silverman did
17 to me is what a few AUSAs said is the conspiracy to deprive me
18 of a fair trial, as the trios' conduct is the same as the Judge
19 Donnelly, AUSA Bensing and the various lawyers that I had prior
20 to Mr. Silverman. **Please Take Notice**, I never told a single AUSA
21 about Sen. Schumer or about hearing an audio of Randi Weingarten
22 bribing Judge Marrero.

23 How much did Randi pay you to deprive me of a fair trial? I do
24 not believe any judge would be proud to allowed Mr. Silverman to
25 commit a crime against me because I want to the world to hear
26 what everyone said to me.

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28 MOTION TO FIND OUT HOW MUCH RANDI WIENGARTEN BRIDED JUDGE ENGELMAYER, AS IT
APPEARS JUDGE ENGELMAYER BEHAVED IN THE SAME MANNER THAT RANDI WANTED JUDGE
MARRERO TOO - 2

1 Your Honor, I do not believe that the public can respect
2 you when you allow Mr. Silverman and the AUSA to lie to you,
3 especially the fact that Mr. Silverman said that he would not
4 present my intent because no believes Cogan committed a crime
5 against you. The clerks are supposed to report you to Chief
6 Livingston for your conduct because you took a bribe like Judge
7 Marrero, as Your Honor has ignored facts that I have letter from
8 the DOJ with statements.

9 You told me what my intent was going to be and then allowed
10 Mr. Silverman to deny me of my intent because Randi paid, as it
11 appears. Your Honor brings disrepute to your office when Your
12 Honor allows outside influences plague your decisions and this
13 needs to be made public because the public has the right to know
14 how and who Your Honor is using office.

15 There are good people within the DOJ and I am sure there are
16 good judges too, but Your Honor, in my view, has brought
17 disrepute to your office because no one can trust a judge who
18 ignores misconduct like the AUSA lying about the Federal Rule of
19 Evidence and I have letters from the DOJ. Can Your Honor see
20 that people see and believe that you were paid by Randi to help
21 her cover up her crimes.

22 Does Your Honor know why some transcripts do not match what I
23 have audio recorded? I would like to hear what Your Honor has
24 to say.

25 I. Facts

26 **AUSA Karamigious**

27
28 MOTION TO FIND OUT HOW MUCH RANDI WIENGARTEN BRIBED JUDGE ENGELMAYER, AS IT
APPEARS JUDGE ENGELMAYER BEHAVED IN THE SAME MANNER THAT RANDI WANTED JUDGE
MARRERO TOO - 3

1. At the last conference, I informed Your Honor that IG's office and Executive Office of the DOJ sent me a letter
2. In the letter each of said that the AUSAs in my case committed misconduct
3. For months, I have told Your Honor that they have committed misconduct
4. For months, I told Your Honor that you knew and understood their misconduct
5. It is misconduct to misrepresent Federal Rule of Evidence because US Marshalls' statement to me are "opposing side."
6. However, Your Honor did not see any evidence and had the pure gall or senior moment, because the AUSA never said that I lied, and said that I lied-without any evidence, unlike me who have Your Honor audio recorded bullying me
7. It is misconduct for a AUSA to participate in a case where her or his former employer is part of
8. It is misconduct for a AUSA to cover up the conduct of their former employer, like Judge Newman wrote opinion about the practice of law
9. It is misconduct for AUSA to cover up a crime, especially if they are not pursuing it, as I have AUSA Gold and others say Judge Cogan commit a crime against me.
10. Your Honor knows this, it is misconduct on your part and there are judicial misconduct opinions that will with a judge who worked for the DOJ and ignored the obvious-just saying, which is on top on Randi paying Judge Marrero to ignore facts

Mr. Silverman

1. Your Honor bullied me for suggesting that Sen. Schumer helped you get your judgeship

MOTION TO FIND OUT HOW MUCH RANDI WIENGARTEN BRIDED JUDGE ENGELMAYER, AS IT APPEARS JUDGE ENGELMAYER BEHAVED IN THE SAME MANNER THAT RANDI WANTED JUDGE MARRERO TOO - 4

- 1 2. Your Honor was so nasty in your bullying that I insinuated
- 2 that I was crazy and stupid
- 3 3. Your Honor never addressed your conduct, which was said to
- 4 be a sign of biasness at Judge Porteous' impeachment trial
- 5 4. At the trial Judge Porteous, Mr. Geyh said that the people
- 6 will not believe a judge is unbiased once they LIED about
- 7 association and loses all integrity in that case
- 8 5. This is a conversation that Mr. Silverman and I had, but he
- 9 refused to write it in the brief
- 10 6. Your Honor did not allow me to make a record
- 11 7. In fact, Mr. Geyh was the only third party that Mr.
- 12 Silverman and I spoke about
- 13 8. I have informed Your Honor that Mr. Silverman
- 14 misrepresented primary witnesses with third party, which I
- 15 have audio recorded and Your Honor ignores
- 16 9. Your Honor received my emails, like Sen. Schumer, so my
- 17 intent in written in the email
- 18 10. Your Honor allowed Mr. Silverman to lie in the briefs
- 19 because Randi paid you
- 20 11. Your Honor knew that my intent was Judge Cogan
- 21 committed a crime against me for the UFT
- 22 12. I sent Your Honor an automatic response from Sen.
- 23 Schumer because he received the same emails
- 24 13. Your Honor did not allow me to develop a record for
- 25 anything because Randi Weingarten paid you

26 **Please Take Notice**, I could go on and on, but if Your Honor
27 would deal with these ideals, I would be happy

28 **Please Take FURTHER Notice**, I bet Your Honor will ignore and if
Your Honor does answer, it would not address any facts that I
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MARRERO TOO - 5

1 have others answer—but I do not have to worry, Your Honor will
2 ignore it because that is what Randi paid for

3
4 Remedy:

- 5 1. I request to develop my claims because they are valid, as I
6 have AUSAs verbally telling me and now I have it in writing
7 too
- 8 2. I want to know what is the going rate to ignore facts, as
9 they were \$10,000 in 2008 with Randi Weingarten and Judge
10 Marrero
- 11 3. To have a nonbiased judge, who is not paid by Randi
12 Weingarten and/or influenced by Sen. Schumer, to review the
13 record and allow me to fully develop a record of criminal
14 activity of Mr. Silverman with all my audio-recordings.
- 15 4. To modify my terms of probation to contact Judicial Council
16 and 2d. Cir. (or only Chief Judge Livingston) for what
17 happened to me during this sham of a trial.
 - 18 a. And to have my appeal transferred outside of the 2d.
19 Cir.
- 20 5. Your Honor used his office for Randi Weingarten and Sen.
21 Schumer
- 22 6. Safeguards enacted when my lawyer or probation impedes me
23 from law enforcements or the court
- 24 7. Unseal documents so the public knows that Your Honor used
25 his office for Randi Weingarten (who paid you) with the
26 help of Sen. Schumer and I sent the senators the sealed
27 documents
- 28 8. I need to directly contact DOJ about crimes because Mr.
Silverman said that he and AUSA agreed that he would
forward my criminal complaints and that is how it is
written.

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MARRERO TOO - 6

1
2 **Please Take Notice**, the 80 DOJ personnel said that Judge
3 Donnelly was covering up the misconduct AUSA and my lawyer

4 Please inform me if Your Honor requires a proper Rule 60 because

5 a) each one can be a separate write up

6 b) there are more claims
7

8 I know Your Honor is not stupid and if 80 DOJ personnel, who
9 were not paid by Randi Weingarten or influenced by Sen. Schumer,
10 then Your Honor with the AUSAS of the ENDY know too. Facts are
11 facts, but the only thing that has changed is the fact that
12 Randi paid you, rather the "appearance"

13
14 Your Honor knows that you brought disrepute to your office
15 because you allow Randi to pay you to deprive me of a fair
16 trial...it is my intent and not yours or Mr. Silverman's intent.
17 In *Tumey v. Ohio* [e]very procedure which would offer a possible
18 temptation to the average man as a judge to forget the burden of
19 proof . . . or which might lead him not to hold the balance
20 nice, clear, and true between the state and the accused denies
21 the latter due process of law 273 U.S. 510 (1927). **Please Take**
22 **Notice**, Your Honor forgot (deliberately because of Randi
23 Weingarten and Sen. Schumer) that my intent, which I describe my
24 right fully under seal and congress has it too, is part of the
25 burden of proof, so this is another reason for rule 60. Then,
26 unlike the common law recusal standard, due process requires
27 that all surrounding circumstances and relationships be
28 considered. In re Murchison, 349 U.S. 133, 136 (1955). So, this

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MARRERO TOO - 7

1 is another reason to look at what Your Honor said to me about
2 Sen. Schumer and facts related to my intent.

3
4
5 I know what should be done and Your Honor knows what should
6 be done, but I can see other outcomes that further deprive me of
7 my constitutional rights, rather the words should be "I know."

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11 Lucio Celli

12 December 30, 2021

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MARRERO TOO - 8